

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SHOLEM WEISNER and SHMUEL NEMANOV)	
)	
Plaintiff and Involuntary Plaintiff)	Case No.: 20-cv-02862-AKH
)	
v.)	
)	
GOOGLE LLC)	
)	
Defendant)	
)	
)	

**PLAINTIFF SHOLEM WEISNER’S
MOTION FOR LEAVE TO FILE
DOCUMENT ECF 249 UNDER SEAL**

PLEASE TAKE NOTICE that Plaintiff, SHOLEM WEISNER (“Weisner”), by and through its undersigned counsel, respectfully moves, pursuant to the Court’s Individual Rule 4.B(i), for permission to leave to file materials under seal. Specifically, Weisner seeks to file the following materials under seal: Weisner’s Memorandum of Law in Opposition to Google LLC’s Motion for Reconsideration (Dkt. 249). The reasons and circumstances that allegedly warrant filing these materials under seal were provided in Google’s Motion for Leave to File Documents Under Seal (Dkt. 195), Google’s Memorandum of Law in Support of Motion for Leave to File Documents Under Seal (Dkt. 196) and the accompanying Declaration of Dave Feltenberger (Dkt. 197), filed in conjunction with Google’s Motion for Summary Judgment. On July 16, 2024, the Court granted Google’s Motion for Leave to File Documents Under Seal (Dkt. 195), and although Weisner does not join in Google’s request to seal, out of courtesy and utmost caution, Weisner likewise seeks to file the above-stated responsive document under seal. In accordance with the Court’s Individual

Rule 4.B(i), Weisner files this motion with redacted versions of the material via ECF, and separately submits unredacted copies of the materials to Chambers.

Dated: September 19, 2024

Respectfully Submitted:

/s/ Aaron W. Davis
Aaron W. Davis, Esq. (admitted *Pro Hac Vice*)
VALHALLA LEGAL, PLLC
P.O. Box 735
Custer, SD 57730-0735
Phone: (763) 957-2397
Email: davis@valhallalegal.com

Plaintiff shall file an unredacted version of ECF No. 249 under seal, visible only to the parties and the Court, to be maintained by the Clerk.

SO ORDERED.

Dated: 9/23/24 /s/ Alvin K. Hellerstein
New York, New York ALVIN K. HELLERSTEIN
United States District Judge

Jacob Ginsburg, Esq.
JACOB GINSBURG, ESQ. PLLC
One Concord Drive
Monsey, NY 10952
Phone: (845) 371-1914
Email: jg@jacobginsburglaw.com

Attorneys for Plaintiff, Sholem Weisner

CERTIFICATE OF SERVICE:

This will certify that a true and accurate copy of the foregoing was filed and served electronically on all counsel of record via the Court's CM/ECF system, on this the 19th day of September, 2024.

/s/ Aaron W. Davis
Attorney for Plaintiff, Sholem Weisner